

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 1:17-mc-00151-LPS

**THE BOLIVARIAN REPUBLIC OF VENEZUELA’S MOTION TO ENFORCE ACCESS
TO STOCK PURCHASE AGREEMENT AND SERVICE OF PAPERS**

The Bolivarian Republic of Venezuela (the “Republic”) respectfully files this Motion to Enforce Access to Stock Purchase Agreement and Service Papers (the “Motion”). The reasons for and arguments in support of the Motion are set forth in the Opening Brief filed contemporaneously herewith. The Republic, the Special Master, and the Sales Process parties met and conferred under Local Rule 7.1.1, and they did not reach agreement to resolve the issues raised in the Motion.

Dated: November 1, 2024

Respectfully submitted,

OF COUNSEL:

Donald B. Verrilli, Jr.
Elaine J. Goldenberg
Ginger D. Anders
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Avenue NW
Suite 500 E
Washington, D.C. 20001
(202) 220-1100
Donald.Verrilli@mto.com
Elaine.Goldenberg@mto.com
Ginger.Anders@mto.com

George M. Garvey
Adeel Mohammadi
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071
(213) 683-9100
George.Garvey@mto.com
Adeel.Mohammadi@mto.com

/s/ Christopher Fitzpatrick Cannataro

A. Thompson Bayliss (#4379)
Christopher Fitzpatrick Cannataro (#6621)
ABRAMS & BAYLISS LLP
20 Montchanin Road, Suite 200
Wilmington, DE 19807
(302) 778-1000
bayliss@abramsbayliss.com
cannataro@abramsbayliss.com

*Attorneys for Bolivarian Republic
of Venezuela*